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July 15, 2021

**VIA ECF**  
**AND FAX: 212-805-0194**

Hon. Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, New York 10007

RE: *Safe Harbor Pollution Insurance et al v. River Marine Enterprises, LLC et al*  
Case No.: 18 Civ. 5942

Dear Judge Buchwald:

We represent plaintiffs/intervenor defendants Safe Harbor Pollution Insurance, Starr Indemnity & Liability Company, Argonaut Insurance Company and Berkshire Hathaway Specialty Insurance Company (collectively “plaintiffs”) in the above-referenced matter. We respectfully request, with the consent of counsel for defendants/intervenor plaintiffs, a small adjustment to the briefing schedule for plaintiffs’ summary judgment motion. Lead counsel for defendants/intervenor plaintiffs has advised that he will be with a new law firm beginning on August 2. He has advised that his representation of defendants/intervenor plaintiffs in this matter is anticipated to continue at the new law firm. To accommodate this move and an anticipated substitution of counsel, we respectfully request that the Court approve the following revised briefing schedule:

	FROM	TO
1. Plaintiffs’ Motion for Summary Judgment	July 16, 2021	Aug. 2, 2021
2. Defendants/Intervenors’ Opposition	Aug. 16, 2021	Sept. 2, 2021
3. Plaintiffs’ Reply	Aug. 30, 2021	Sept. 16, 2021

This is the parties’ first request for an extension of time concerning plaintiffs’ motion for summary judgment.

We thank the Court for its time and consideration to this matter.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY

By:

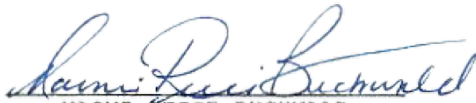


Gueric S.D.L. Russell

cc: ALL PARTIES VIA ECF

Application granted.

**SO ORDERED.**



NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: New York, New York  
July 15, 2021